

EXHIBIT B

Declaration of Natalie L. Winslow

Exhibit B

1 ARIEL E. STERN, ESQ.
Nevada Bar No. 8276
2 NATALIE L. WINSLOW, ESQ.
Nevada Bar No. 12125
3 JAMIE K. COMBS, ESQ.
Nevada Bar No. 13088
4 **AKERMAN LLP**
1635 Village Center Circle, Suite 200
5 Las Vegas, NV 89134
Telephone: (702) 634-5000
6 Facsimile: (702) 380-8572
Email: ariel.stern@akerman.com
7 Email: natalie.winslow@akerman.com
Email: jamie.combs@akerman.com
8

9 *Attorneys for Rushmore Loan Management*
Services, LLC

10 **UNITED STATES BANKRUPTCY COURT**

11 **DISTRICT OF NEVADA**

12
13 In re:

14 Schulte Properties, LLC,

15
16 Debtor.
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Case No.: 18-12734-mkn

Chapter 11

**DECLARATION OF NATALIE L.
WINSLOW IN SUPPORT OF MOTION TO
ENFORCE SETTLEMENT TERMS**

21 I, Natalie L. Winslow, under penalty of perjury, declare as follows:

22 1. I am a partner at the Akerman LLP law firm. I represent Rushmore Loan
23 Management Services, LLC in this action. I make this declaration in support of Rushmore's motion
24 to enforce settlement terms related to the loans secured by the properties located at 10317
25 Neopolitan Place, Las Vegas, Nevada and 2861 Marathon Drive, Henderson, Nevada.

26 2. The parties attended a settlement conference on September 18 and December 4, 2020.
27 The parties settled the issues between them in the current bankruptcy and Ms. Schulte's individual
28 bankruptcy at the conference. The material settlement terms were placed on the record.

1 3. As part of the settlement, Rushmore agreed to modify the two at-issue loans.

2 4. The parties filed a joint motion to approve settlement on February 3, 2021, which the
3 court granted on March 4, 2021.

4 5. After significant negotiations between Rushmore and Schulte Properties, the parties
5 executed written settlement agreements. The settlement agreements required, in part, that Schulte
6 Properties provide proof of payment of insurance or taxes within thirty days of written request from
7 Rushmore.

8 6. On July 2, 2021, I sent written correspondence to Schulte Properties through its
9 counsel. I requested that Schulte Properties provide proof of insurance pursuant to the terms of the
10 settlement agreements. A true and correct copy of the letter is attached as Exhibit A to the motion.

11 7. To date, I have not received proof of payment.

12 I declare, under penalty of perjury, that the foregoing statements are true and correct to the
13 best of my knowledge, information, and belief.

14 DATED: August 11, 2021.

15 /s/ Natalie L. Winslow

16 NATALIE L. WINSLOW, ESQ.
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AKERMAN LLP

1635 VILLAGE CENTER CIRCLE, SUITE 200
LAS VEGAS, NEVADA 89134
TEL.: (702) 634-5000 – FAX: (702) 380-8572